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Attorney for Plaintiff,
MICHAEL GRECCO PRODUCTIONS, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
LAS VEGAS DIVISION**

MICHAEL GRECCO
PRODUCTIONS, INC. d/b/a
MICHAEL GRECCO
PHOTOGRAPHY, INC.,

Plaintiff,

v.

MONICA DODGE aka ANICA
MARTIN d/b/a fashionilluminati.com;
DOES 1 through 10 inclusive,

Defendants.

Case No. 2:17-cv-02313-JCM-NJK

**REQUEST FOR ENTRY OF
DEFAULT**

Filed and Served Concurrently:

1. Declaration of Mathew K. Higbee
2. [Proposed] Entry of Default

Michael Grecco Productions, Inc. (“Plaintiff”) hereby requests that the Clerk of the above-titled Court enter default in this action against Monica Dodge aka Anica Martin d/b/a fashionilluminati.com. (“Defendant”), on the grounds that

Defendant has failed to appear or otherwise respond to the Complaint in this action within the time proscribed by the Federal Rules of Civil Procedure.

Defendant was personally served with the Summons and Complaint on October 9, 2017 pursuant to Rule 4 of the Federal Rules of Civil Procedure.

Proof of service on Defendant was previously filed with the Court on October 26, 2017. See Docket #7.

The above-stated facts are set forth in the attached Declaration of Mathew K. Higbee, filed herein.

Dated: October 31, 2017

Respectfully submitted,

/s/ Mathew K. Higbee
Mathew K. Higbee, Esq.
Nevada Bar No. 11158
HIGBEE & ASSOCIATES
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, the undersigned, say:

I am a citizen of the United States and I am a member of the Bar of this Court. I am over the age of 18 and not a party to the within action.

My business address is 1504 Brookhollow Dr., Ste 113, Santa Ana, California, 92705.

On October 31, 2017, I caused to be served the foregoing **Request for Entry of Default, Declaration of Mathew K. Higbee, and Proposed Entry of Default** on all parties in this action by placing a true copy thereof enclosed in a sealed envelope as follows:

Monica Dodge
145 E. Harmon Ave. #24
Las Vegas, NV 89109

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by via the *CM/ECF* system. Participants in this case who are not registered with the *CM/ECF* system will be served by first-class mail or by other means permitted by the Court.

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on October 31, 2017, at Santa Ana, California.

*/s/ **Mathew K. Higbee***
Mathew K. Higbee, Esq.
Counsel for Plaintiff